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10  
11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

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14  
15 UNITED STATES OF AMERICA,

16 Plaintiff,

v.

17 APPROXIMATELY \$48,500.00 IN U.S.  
18 CURRENCY,

19 Defendant.

20 2:21-MC-00012-MCE-DB

21 STIPULATION AND ORDER EXTENDING TIME  
22 FOR FILING A COMPLAINT FOR FORFEITURE  
23 AND/OR TO OBTAIN AN INDICTMENT  
24 ALLEGING FORFEITURE

25 It is hereby stipulated by and between the United States of America and potential claimants  
26 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as  
follows:

27 1. On or about September 23, 2020, the Homeland Security Investigations seized the above-  
28 referenced defendant asset pursuant to a State search and seizure warrant (hereafter “defendant asset”).

29 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required  
30 to send notice to potential claimants, file a complaint for forfeiture against the defendant currency, or  
31 obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days of  
32 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
33 deadline was January 20, 2021.

34 3. By Stipulation and Order filed January 22, 2021, the parties stipulated to extend to April  
35 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against

1 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
2 forfeiture.

3 4. By Stipulation and Order filed April 28, 2021, the parties stipulated to extend to June 18,  
4 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
6 forfeiture.

7 5. By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to August  
8 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
9 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
10 forfeiture.

11 6. By Stipulation and Order filed August 17, 2021, the parties stipulated to extend to  
12 October 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
14 subject to forfeiture.

15 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
16 December 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
18 subject to forfeiture.

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1       8. Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to December 17, 2021.

4 Dated: 10/18/2021

PHILLIP A. TALBERT  
Acting United States Attorney

6 By: /s/ Kevin C. Khasigian  
7 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

8 Dated: 10/15/2021

9 /s/ Mark J. Reichel  
10 MARK J. REICHEL  
11 Attorney for Potential Claimants  
Xiaobing Wang, Min Guo, and Lianfeng Li  
(Signature authorized by email)

12 IT IS SO ORDERED.

13 Dated: October 21, 2021

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15 MORRISON C. ENGLAND, JR.  
16 SENIOR UNITED STATES DISTRICT JUDGE